

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SAMIRA SIERRA, AMALI SIERRA,  
RICARDO NIGAGLIONI, and ALEX GUTIERREZ,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

CITY OF NEW YORK, a municipal entity;  
BILL DE BLASIO, in his individual capacity;  
DERMOT F. SHEA, in his individual capacity;  
TERENCE A. MONAHAN, in his individual capacity;  
UMID KARIMOV, in his individual capacity;  
ALFREDO JEFF, in his individual capacity;  
DEBORA MATIAS, in her individual capacity; and  
ANDRE JEANPIERRE, in his individual capacity,  
KENNETH C. LEHR, in his individual capacity,

Defendants.  
----- X

20 Civ 10291 (CM)(GWG)

**STIPULATION TO DISMISS  
PLAINTIFFS' REQUEST FOR  
DECLARATORY OR  
INJUNCTIVE RELIEF**

**WHEREAS**, plaintiffs Samira Sierra, Amali Sierra, Ricardo Nigaglioni, and Alex Gutierrez (hereinafter referred to as "plaintiffs), by their attorney Michael L. Spiegel, Esq., on March 5, 2021, filed an Amended Complaint in this action, alleging, *inter alia*, that the defendants violated their rights under 42 U.S.C. § 1983 and New York state law; and

**WHEREAS**, defendants have denied any and all liability arising out of plaintiffs' allegations; and

**WHEREAS**, plaintiffs now seek to voluntarily dismiss their claims for declaratory or injunctive relief against the defendants; and

**WHEREAS**, plaintiffs have authorized their counsel to agree to the terms set forth below;

**NOW, IT IS HEREBY STIPULATED AND AGREED**, by and between counsel for the parties as follows:

1. Pursuant to Fed. R. Civ. 41(a), that any and all claims alleged in the First Amended Complaint seeking declaratory/injunctive relief that were asserted or could have been asserted on behalf of the plaintiffs, against the defendants, their successors and assigns, and any present or former employees and agents of the City of New York, or any entity represented by the Office of the Corporation Counsel, are hereby dismissed and discontinued *with prejudice*, and without any admission of liability or wrongdoing, and without attorney's fees, costs or disbursements to any party.

2. This Stipulation contains all the terms and conditions agreed upon by counsel for defendants and counsel for plaintiffs hereto, and no oral agreement entered into at any time nor any written agreement entered into prior to the execution of this Stipulation shall be deemed to exist, or to bind the parties hereto, or to vary the terms and conditions contained herein.

3. This Stipulation shall be binding upon the parties immediately upon signature and shall be submitted to the Court for entry as an Order.

Dated: New York, New York

June 23, 2022

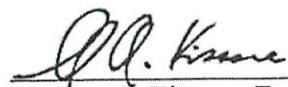
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s/  
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*For Plaintiffs*

Sylvia Hinds-Radix  
Corporation Counsel for the City of New York  
100 Church Street

  
New York, NY 10007.

By

*For Defendants City of New York and the Individual Defendants*



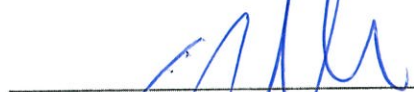
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*For Intervenor-Defendant Police Benevolent Association of the City of New York*



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